NEW MEXICO
ENVIRONMENT DEPARTMENT

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lt. Governor

Harold Runnels Building
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-0187 Fax (505) 827-0160
www.env.nm.gov

BUTCH TONGATE
Cabinet Secretary-Designate

J. C. BORREGO
Deputy Secretary

Certified Mail – Return Receipt Requested

February 21, 2017

Mr. Alex C. Brown, Town Manager
P.O. Box 1188
Silver City, New Mexico 88062

Re: Silver City Waste Water Treatment Facility, Major, Individual Permit, SIC 4952, NPDES Compliance Evaluation Inspection, NM0020109, January 19, 2017

Dear Mr.Brown:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator
Environmental Protection Agency, Region 6
NPDES Enforcement Branch (6EN-WM)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

David Long is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at 505-827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Acting Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Brent Larsen and Tung Nguyen, USEPA (6WQ-PP) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
Michael Kesler, NMED District III by e-mail
Manny Orosco, Town of Silver City by e-mail

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	3	NPDES	11	yr/mo/day	17	Inspec. Type	19	Inspector	20	Fac Type
	N	5	NM0020109		170119		C		S		1

Remarks: MAJOR MUNICIPAL WWTP

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
				3		N		N					

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

SILVER CITY WASTEWATER TREATMENT PLANT:
1660 FILAREE ROAD, SILVER CITY, NM 88061
GRANT COUNTY

Entry Time /Date
8:10 am Jan 19, 2017

Exit Time/Date
1:10 pm Jan 19, 2017

Permit Effective Date
September 1, 2013

Permit Expiration Date
August 31, 2018

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
MR. MANNY OROSCO, Plant Operator, (575) 388-4981
MR. CHRIS MARRUFO, LAB TECHNICIAN, (575) 534-6535

Name, Address of Responsible Official/Title/Phone and Fax Number

MR. ALEX C. BROWN, TOWN MANAGER (575) 534-6358
P.O. BOX 1188
SILVER CITY, NM 88062

Contacted: Yes [ ] No [x]

Other Facility Data

GPS:
N 32° 42' 54"
W -108° 14' 47"
SIC 4952

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	M	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	M	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	S	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached sheets for further details.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Jennifer Foote */s/ Jennifer Foote*	**NMED/SWQB 505-827-0596**	**2/16/17**
Signature of Management QA Reviewer */s/ Sarah Holcomb* **Sarah Holcomb, Acting Program Manager**	**Agency/Office/Phone and Fax Numbers** **NMED/SWQB 505-827-2798**	**Date** **2/21/17**

Silver City WWTP	Jan 19, 2017	PERMIT NO. NM0020109

SECTION A - PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS:	☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED NO*)
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	☒ Y ☐ N ☐ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	☐ Y ☐ N ☒ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	☒ Y ☐ N ☐ NA
4. ALL DISCHARGES ARE PERMITTED	☒ Y ☐ N ☐ NA
SECTION B - RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. DETAILS:.	☐ S ☒ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED Yes*)
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	☒ Y ☐ N ☐ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	☐ S ☒ M ☐ U ☐ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	☒ Y ☐ N ☐ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	☒ Y ☐ N ☐ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	☒ Y ☐ N ☐ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	☒ Y ☐ N ☐ NA
e) DATES AND TIMES OF ANALYSES.	☒ Y ☐ N ☐ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	☒ Y ☐ N ☐ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	☐ S ☐ M ☒ U ☐ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR	☒ S ☐ M ☐ U ☐ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	☒ Y ☐ N ☐ NA
SECTION C - OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. DETAILS: **New grit chamber and belt press installed. Reuse water meter being replaced.**	☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED No)*
1. TREATMENT UNITS PROPERLY OPERATED.	☒ S ☐ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	☒ S ☐ M ☐ U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.	☒ S ☐ M ☐ U ☐ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☒ S ☐ M ☐ U ☐ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE.	☒ S ☐ M ☐ U ☐ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. **No backup Level4 WW operator**	☐ S ☒ M ☐ U ☐ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	☒ S ☐ M ☐ U ☐ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	☒ Y ☐ N ☐ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	☒ Y ☐ N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	☒ Y ☐ N ☐ NA

Silver City WWTP	Jan 19, 2017	PERMIT NO. NM0020109

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	☒ Y ☐ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	☒ Y ☐ N ☐ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	☒ Y ☐ N ☐ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	☐ Y ☒ N ☐ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	☐ Y ☐ N ☒ NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☐ S ☒ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED* *Yes* *).*
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☒ Y ☐ N ☐ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	☒ Y ☐ N ☐ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. **Chlorine not sampled**	☐ Y ☒ N ☐ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	☒ Y ☐ N ☐ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	☒ Y ☐ N ☐ NA
b) PROPER PRESERVATION TECHNIQUES USED.	☒ Y ☐ N ☐ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	☒ Y ☐ N ☐ NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	☒ Y ☐ N ☐ NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☐ S ☒ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED* *No* *)*
DETAILS: **December influent readings off due to piping repairs(no backup system). Scott Park meter being replaced as it was giving erroneous readings. No meter for Glen Ranch reuse water.**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE 9" Parshall, 6" flume not normally used	☒ Y ☐ N ☐ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED..	☒ Y ☐ N ☐ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	☒ Y ☐ N ☐ NA
4. CALIBRATION FREQUENCY ADEQUATE. *(DATE OF LAST CALIBRATION* 7-14-16)	☒ Y ☐ N ☐ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	☒ Y ☐ N ☐ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. **Monthly**	☒ Y ☐ N ☐ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	☒ Y ☐ N ☐ NA
6. HEAD MEASURED AT PROPER LOCATION.	☒ Y ☐ N ☐ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	☒ Y ☐ N ☐ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED* *No* *)*
DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	☒ Y ☐ N ☐ NA

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☐ S ☐ M ☒ U ☐ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. ☒ S ☐ M ☐ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. 10 % OF THE TIME. **BOD, E. coli, TSS** ☒ Y ☐ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. ___ % OF THE TIME. ☐ Y ☒ N ☐ NA

7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NA

LAB NAME **HUTHER AND ASSOCIATES, INC.**
LAB ADDRESS 1156 NORTH BONNIE BRAE, DENTON, TX 76201
PARAMETERS PERFORMED WHOLE EFFLUENT TOXICITY

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED NO).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	None	none	none	light	none	Clear golden	

RECEIVING WATER OBSERVATIONS Currently all water to river. Sometimes divert reuse water to Glen Ranch and usually to Scott Park.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED No).*

DETAILS: **Sludge sent to landfill for disposal**

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☒ S ☐ M ☐ U ☐ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☒ S ☐ M ☐ U ☐ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED ___).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☐ N ☒ NA

2. TYPE OF SAMPLE OBTAINED

GRAB _____ COMPOSITE SAMPLE ___ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☒ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☒ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☒ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☒ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☒ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☒ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☒ NA

Compliance Evaluation Inspection
Silver City WWTP NPDES Permit No. NM0020109
Inspection Date: January 19, 2017
Further Explanations

INTRODUCTION:
On January 19, 2017, Jennifer Foote of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Silver City Wastewater Treatment Plant (WWTP). The facility is classified as a major municipal discharger under the federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0020109. The WWTP has a design capacity of 2.0 million gallons per day (MGD). The NPDES permit regulates the WWTP discharge to San Vicente Arroyo in Water Quality Segment 20.6.4.803 of the New Mexico Administrative Code (NMAC). This segment includes the designated uses of coldwater aquatic life, irrigation. livestock watering, wildlife habitat, and primary contact. Approximately one quarter of a mile downstream of this discharge, San Vicente Arroyo is classified as ephemeral.

The NMED performs a certain number of inspections for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by NMED staff, and records and reports kept by the permittee and/or NMED.

INSPECTION DETAILS:
The inspector arrived at the Silver City Wastewater Treatment Facility at 0810 hours and made introductions, stated the purpose of the inspection, and Ms. Foote presented credentials to Mr. Manny Orosco, Plant Operator. The Inspector and Mr. Orosco toured the facility and then Mr. Chris Marruffo provided a tour of the laboratory. An exit conference was conducted with Mr. Orosco at 1pm to discuss preliminary findings.

TREATMENT SCHEME:
Raw sewage arrives by gravity flow at the WWTP entrance works via two separate lines, one from Silver City proper and one from Maude Canyon (east of town). Influent enters the plant at the primary influent lift station. The pump station has two submersible pumps as well as a screw pump for the return activated sludge (RAS). The influent is directed to a primary automatic bar screen and new grit chamber, then to a secondary bar screen chamber located adjacent to the entrance works. At the primary grit chamber, wastewater is lifted to a 12-inch Parshall flume and a sonic secondary measurement device where the influent flow is recorded. The plant has a call alarm system to notify the plant staff of high flow, low flow, and electrical problems at the plant. Emergency generators have automatic activation. The plant is normally staffed 8 hrs/day 5 days a week and 2 hrs/day on weekends. Flow from the secondary grit chamber is directed through a splitter box where effluent is divided evenly between two primary clarifiers that operate in parallel. Sludge is collected by rotating scrapers and directed to a sump located in the center of the clarifiers. The collected sludge is then pumped to the aerobic digesters. Flow continues to another splitter box prior to entering the anoxic basin component consisting of 2-bioselectors, and 4-anoxic basins. A bypass channel with side gates is operated to select which basins are used. The anoxic basins were designed for denitrification, to improve effluent quality. Recirculation speed can be adjusted to balance ammonia and nitrate in the secondary effluent. Wastewater flows from the primary clarifiers to the aeration basins that have four mechanical brush aerators. From the aeration basin, flow enters a splitter box and is divided before entering two secondary/final clarifiers. Activated sludge that settles in these units is periodically pumped back as Returned Activated Sludge (RAS) or pumped out of the process to the sludge digesters. From the secondary clarifiers, flows are combined then routed to an Ultraviolet (UV) disinfection system that contains two self cleaning UV drums. The treated effluent flows through the former chlorine contact chamber. Effluent then flows to a manhole where it is split for reuse water for Scott Park or Glen Ranch, and a 6" parshall flume or a 9" parshall flume where the effluent flow is recorded before flowing to the permitted outfall.

SLUDGE:
Sludge is batch wasted from the bottom of the primary clarifiers, anoxic basins, and aerobic basin to an aerobic sludge digester. From the digester, sludge is piped to a new belt press and then into a truck. Liquid from the belt press and drying beds is decanted and returned to the entrance works. The dried sludge is stored on site and then shipped to the Southwest New Mexico Regional Landfill for final disposal.

COLLECTION SYSTEM:
The collection system is managed by a different department in the city. The Town of Silver City has a city grease ordinance. One pump or lift station in the collection system is maintained by the Town of Silver City, a second pump or lift station in the collection system is maintained by a developer. SSOs are reported monthly with the DMRs.

SEPTAGE RECEIVING:
This facility also accepts septage (residential and USFS vaults) at a dump station located at the south end of the plant. Septage is not tested for pH, it is aerated and slowly released to blend with the influent. It is estimated that 70,000 gallons a month of septage is treated. The plant also accepts about 50,000 gallons a year of grease trap waste and uses a drying bed for evaporation before sending the grease to the landfill.

FINDINGS:
Section B – Recordkeeping and Reporting Evaluation – Overall Rating of "Marginal".

The permit requires, in Part III.C.5.b:
The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.

And in Part III.D.9. OTHER INFORMATION
Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.

Findings for Recordkeeping and Reporting:

- The NIST thermometer used for calibrations was last calibrated 4-26-13. EPA recommends that calibrations be performed yearly by an outside representative to ensure the best possible laboratory data. Operators stated they would send it in for calibration.

- The inspector reviewed lab and data records for December 2016. There was a discrepancy with the low pH value as reported on the DMR as 7.55, however a pH of 7.53 was recorded in the DMR datasheet on 12/23/16 (attachment 1). The report should be corrected.

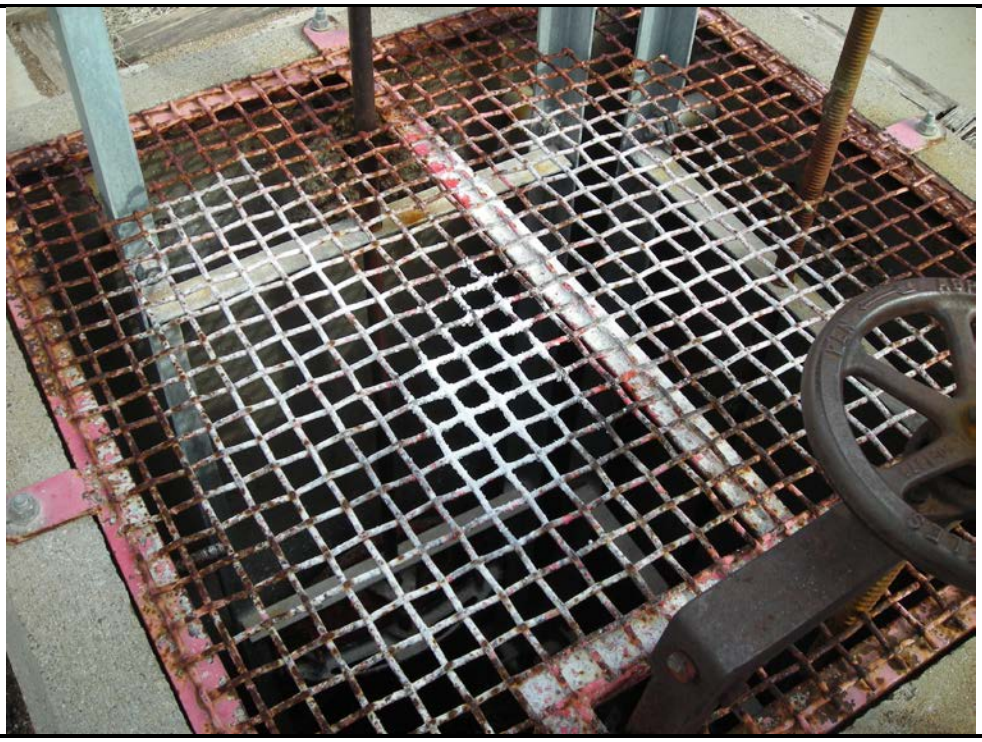
Section D – Self Monitoring – Overall Rating of "Marginal".

The permit states, in Part I,1 Footnotes:
**4 TRC shall be measured during periods when chlorine is used as either backup bacteria control or when disinfection of plant treatment equipment is required. Regulations at 40 CFR Part 136 define "instantaneous grab" as analyzed within 15 minutes of collection. The effluent limitation for TRC is the instantaneous maximum and cannot be averaged for reporting purposes..*

Findings for Self Monitoring:

- The facility reports zero on the DMR during times they are not using Chlorine. It is unclear when the facility is not measuring Chlorine and reporting zero or when they are reporting as zero due to minimum quantification levels. Adding a note in the comments section of the DMR would resolve the confusion. The permittee stated that they are using chlorine as for cleaning algae at the outfall, but does not regularly sample for chlorine. The permittee is required to sample for Total Residual Chlorine (TRC) when used.

NMED/SWQB Official Photograph Log Photo # 1		
Photographer: J. Foote	Date: 1/19/2017	
City/County: Silver City, Grant Co.		State: New Mexico
Location: Silver City WWTP		
Subject: White crystalline crust on effluent manhole grate		



NMED/SWQB Official Photograph Log Photo # 2		
Photographer: J. Foote	Date: 1/19/2017	
City/County: Silver City, Grant Co.		State: New Mexico
Location: Silver City WWTP		
Subject: effluent flume		

Attachment 1

Dec 2016 DMR data Sheet
Dec 2016 DMR

DMR
December 2010

DATE	BOD MG/L	BOD LB/DAY	TSS MG/L	TSS LB/DAY	E.Coli	LOG	PH	FLOW MGD	BOD% REMOVAL	TSS % REMOVAL
12/5/2016		0.00		0.00	21.66	1.34	7.7			
12/7/2016		0.00		0.00	44.00	1.64	7.76			
12/9/2016	8.06	40.56	0.83	4.18	64.66	1.81	7.71	0.60	89.92%	98.96%
duplicate		0.00		0.00						
AVG	8.06	40.56	0.83	4.18	39.50	1.60				
		check of the antilog function=				39.50				
DATE	**BOD MG/L**	**BOD LB/DAY**	**TSS MG/L**	**TSS LB/DAY**	**E.Coli**	**LOG**	**PH**	**FLOW MGD**		
12/12/2016		0.00		0.00	10.58	1.02	7.73			
12/14/2016		0.00		0.00	25.00	1.40	7.68			
12/16/2016	9.52	93.10	1.17	11.44	50.66	1.70	7.83	1.17	89.76%	98.74%
duplicate		0.00		0.00						
AVG	9.52	93.10	1.17	11.44	23.75	1.38				
DATE	**BOD MG/L**	**BOD LB/DAY**	**TSS MG/L**	**TSS LB/DAY**	**E. Coli**	**LOG**	**PH**	**FLOW MGD**		
12/19/2016		0.00		0.00	10.00	1.00	7.76			
12/21/2016		0.00		0.00	33.00	1.52	7.8			
12/23/2016	8.68	75.92	1.33	11.63	46.66	1.67	7.53	1.0488	90.76%	90.38%
duplicate		0.00		0.00						
AVG	8.68	75.92	1.33	11.63	24.88	1.40				
DATE	**BOD MG/L**	**BOD LB/DAY**	**TSS MG/L**	**TSS LB/DAY**	**E. Coli**	**LOG**	**PH**	**FLOW MGD**		
12/26/2016		0.00		0.00	50.00	1.70	7.61			
12/28/2016		0.00		0.00	78.66	1.90	7.85			
12/30/2016	9.17	78.01	2.66	22.63	13.51	1.13	7.55	1.02	87.93%	96.50%
duplicate		0.00		0.00						
AVG	#VALUE!	78.01	2.66	22.63	37.59	1.58				
	BOD MG/L	**BOD LB/DAY**	**TSS MG/L**	**TSS LB/DAY**	**E. Coli**	**LOG**			**BOD% AVE**	**TSS % AVE**
	8.86	71.90	1.50	12.47	30.61	1.49			89.59%	96.15%

DMR Copy of Record

Permit					
Permit #:	**NM0020109**	**Permittee:**	SILVER CITY, TOWN OF	**Facility:**	SILVER CITY, TOWN OF WWTP
Major:	Yes	**Permittee Address:**	1660 FILAREE RD.7MI S.OF CITY GRANT COUNTY, NM 88061	**Facility Location:**	1660 FILAREE RD.7MI S.OF CITY SE OF STATE 90/E.OF BROKEN ARR GRANT COUNTY, NM 88061
Permitted Feature:	001 External Outfall	**Discharge:**	**001-A** TREATED MUNICIPAL WASTEWATER		
Report Dates & Status					
Monitoring Period:	**From 12/01/16 to 12/31/16**	**DMR Due Date:**	**01/15/17**	**Status:**	**NetDMR Validated**
Considerations for Form Completion					
Principal Executive Officer					
First Name:		**Title:**		**Telephone:**	
Last Name:					
No Data Indicator (NODI)					
Form NODI:	--				

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00310	BOD, 5-day, 20 deg. C	1 - Effluent Gross	0	--	Sample	=	71.9	=	93.1	26 - lb/d			=	8.86	=	9.52	19 - mg/L		01/07 - Weekly	06 - COMP-6
					Permit Req.	<=	500 30DA AVG	<=	750 7 DA AVG	26 - lb/d			<=	30 30DA AVG	<=	45 7 DA AVG	19 - mg/L		01/07 - Weekly	06 - COMP-6
					Value NODI															
00400	pH	1 - Effluent Gross	0	--	Sample						=	7.55			=	7.85	12 - SU		03/07 - Three Per Week	GR - GRAB
					Permit Req.						>=	6.6 MINIMUM			<=	9 MAXIMUM	12 - SU		03/07 - Three Per Week	GR - GRAB
					Value NODI															
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample	=	12.47	=	22.63	26 - lb/d			=	1.5	=	2.66	19 - mg/L		01/07 - Weekly	06 - COMP-6
					Permit Req.	<=	500 30DA AVG	<=	750 7 DA AVG	26 - lb/d			<=	30 30DA AVG	<=	45 7 DA AVG	19 - mg/L		01/07 - Weekly	06 - COMP-6
					Value NODI															
50050	Flow, in conduit or thru treatment plant	1 - Effluent Gross	0	--	Sample						=	1.04	=	1.14	=	1.4	03 - MGD		99/99 - Continuous	TM - TOTALZ
					Permit Req.							Req Mon 30DA AVG		Req Mon 7 DA AVG		Req Mon DAILY MX	03 - MGD		99/99 - Continuous	TM - TOTALZ
					Value NODI															
50060	Chlorine, total residual	A - Disinfection, Process Complete	0	--	Sample										=	0	28 - ug/L		01/01 - Daily	GR - GRAB
					Permit Req.										<=	11 INST MAX	28 - ug/L		01/01 - Daily	GR - GRAB
					Value NODI															
51040	E. coli	1 - Effluent Gross	0	--	Sample								=	30.61	=	78.66	3Z - CFU/100mL		03/07 - Three Per Week	GR - GRAB
					Permit Req.								<=	206 30DAVGEO	<=	940 DAILY MX	3Z - CFU/100mL		03/07 - Three Per Week	GR - GRAB
					Value NODI															
81010	BOD, 5-day, percent removal	1 - Effluent Gross	0	--	Sample						=	89.59					23 - %		01/07 - Weekly	CA - CALCTD
					Permit Req.						>=	85 MO AV MN					23 - %		01/07 - Weekly	CA - CALCTD
					Value NODI															
81011	Solids, suspended percent removal	1 - Effluent Gross	0	--	Sample						=	96.15					23 - %		01/07 - Weekly	CA - CALCTD
					Permit Req.						>=	85 MO AV MN					23 - %		01/07 - Weekly	CA - CALCTD
					Value NODI															

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments

Attachments

Name	Type	Size
sewer_overflow_december_2016.pdf	pdf	233377

Report Last Saved By

SILVER CITY, TOWN OF

User:	Manny	Date/Time:	2017-01-10 11:58 (Time Zone: -06:00)
Name:	Manuel Orosco		
E-Mail:	silvercitywwtp@powerc.net		

TOWN OF SILVER CITY
UTILITIES DEPARTMENT 1211 N. HUDSON STREET
BOX 1188, SILVER CITY, NEW MEXICO 88062 • (575) 534-6365 • FAX (575) 534-6391

February 28, 2017

David Long, NPDES Enforcement Coordinator
Environmental Protection Agency, Region 6
NPDES Enforcement Branch (6EN-WM)
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: Response to NPDES Compliance Evaluation Inspection Letter Dated Feb. 21, 2017; Silver City Waste Water Treatment Facility, Major, Individual Permit, SIC 4952, Compliance Evaluation Inspection, NM0020109, January 19, 2017

Dear Mr. Long:

On January 17, 2017, Jennifer Foote from the NMED Surface Water Quality Bureau conducted an NPDES Compliance Evaluation Inspection on behalf of the EPA. A Compliance Evaluation Inspection letter and a copy of the inspection report was provided to the Town of Silver City and in the letter it encouraged the Town of Silver City to provide EPA and NMED written notification of the Town's modifications and compliance schedules. As a result, the Town of Silver City is hereby providing a written response to the inspection report which will address the findings outlined in the inspection report.

Listed below are the findings outlined in the inspection report with corrective action taken or proposed to address the findings.

Section B- Recordkeeping and Reporting Evaluation:

Findings for Record Keeping and Reporting:

1. *The NIST thermometer used for calibrations was last calibrated 4-26-13. EPA recommends that calibrations be performed yearly by an outside representative to ensure the best possible laboratory data. Operators stated they would send it in for calibratioin.*

   NIST Thermometer has been sent for calibration and was competed on Feb. 8, 2017. A copy of the Calibration Certificate is attached.

2. *The inspector reviewed lab and data records for December 2016. There was a discrepancy with the low pH value as reported on the DMR as 7.55, however a pH of 7.53 was recorded in the DMR datasheet on 12/23/16. The report should be corrected.*

   DMR for December 2016 was corrected on Feb. 22, 2017 to reflect the correct pH level. A copy of the corrected DMR is attached.

Section D – Self Monitoring

Finding for Self Monitoring:

1. *The facility reports zero on the DMR during times they are not using Chlorine. It is unclear when the facility is not measuring Chlorine and reporting zero or when they are reporting as zero due to minimum quantification levels. Adding a note in the comments section of the DMR would resolve the confusion. The permittee stated that they are using chlorine as for cleaning algae at the outfall, but does not regularly sample for chlorine. The permittee is required to sample for Total Residual Chlorine (TRC) when used.*

   The Town of Silver City will begin noting on DMR's that the facility utilizes a UV disinfection system to disinfect; and will also begin sampling for Total Residual Chlorine when chlorine is used for treatment or cleaning of the facility.

Should you have any questions regarding the Town of Silver City's response to the inspection report, please contact me directly at (575)534-6355 so that I may be of further assistance.

Your cooperation is appreciated.

Sincerely,

Robert M. Esqueda
Utilities Director

cc: Alex Brown, Town Manager
Program Manager, NMED, Surface Water Quality Bureau, Point Source Regulation Section
File

QA BALANCE SERVICES INC.

CALIBRATION CERTIFICATE

QA BALANCE SERVICES INC.
7812 SOUTH NEWBERN CIRCLE
AURORA, CO 80016
303-693-6419

CUSTOMER:
Town of Silver City
1660 Fillaree Broken Arrow
Silver City, NM

INSTRUMENT: Thermometer
MODEL: -1 TO 201°C
SERIAL: 79320009

CALIBRATION DATE: 02.08.2017
RECALIBRATION DATE: 02.2018

CONDITION OF ITEM AS FOUND/LEFT In Tolerance/In Tolerance
Calibrated to .1% ± .7°C (1.3°F)
Probe Calibrated to ± 2.2°C (3.96°F)

ENVIRONMENTAL CONDITIONS		STANDARDS UTILIZED
Temp	66.4°F	6413 LP077
Humidity	26%RH	Calibration due date: 03.21.2017

The above instrument listed meets or exceeds all manufacturers' specifications. The instrument has been calibrated using standards whose accuracies are traceable to NIST within the limitations of their calibration services and have been derived from accepted values of natural physical constants. The system requirements satisfy ANSI/NCSL Z-540, MIL-STD 45662A, FDA, GMP 820.61 and ISO/IEC 17025.

Results contained herein relate only to the component listed above.

Certified by: _____ Calibration Technician

Date: 02.08.2017

Edit DMR

Collapse Header

Permit

Permit ID:	NM0020109	**Major:**	☑
Permittee:	SILVER CITY, TOWN OF	**Permittee Address:**	1660 FILAREE RD.7MI S.OF CITY GRANT COUNTY, NM 88061
Facility:	SILVER CITY, TOWN OF WWTP	**Facility Location:**	1660 FILAREE RD.7MI S.OF CITY GRANT COUNTY, NM 88061
Permitted Feature:	001 - External Outfall	**Discharge:**	A - TREATED MUNICIPAL WASTEWATER

Report Dates & Status

Monitoring Period:	From 12/01/16 to 12/31/16	**DMR Due Date:**	01/15/17
Status:	**NetDMR Validated**		

Principal Executive Officer

First Name:		**Last Name:**	
Title:		**Telephone:**	

No Data Indicator (NODI)

Form NODI:

Parameter Code	Parameter Name	NODI	Quantity or Loading Value 1	Quantity or Loading Value 2	Quantity or Loading Units	Quality or Concentration Value 1	Quality or Concentration Value 2	Quality or Concentration Value 3	Quality or Concentration Units	# of Ex.	Freq. of Analysis	S T
00310	BOD, 5-day, 20 deg. C	Smpl.	= 71.9	= 93.1	lb/d		= 8.86	= 9.52	mg/L		01/07	0
1 - Effluent Gross												
Season: 0		Req.	<= 500 30 Day Average	<= 750 7 Day Average	Pounds per Day		<= 30 30 Day Average	<= 45 7 Day Average	Milligrams per Liter		Weekly	C(
NODI:		NODI										
00400	pH	Smpl.				= 7.53		= 7.85	SU		03/07	G
1 - Effluent Gross												
Season: 0		Req.				>= 6.6 Minimum		<= 9 Maximum	Standard Units		Three Per Week	GI
NODI:		NODI										
00530	Solids, total suspended	Smpl.	= 12.47	= 22.63	lb/d		= 1.5	= 2.66	mg/L		01/07	0
1 - Effluent Gross												
Season: 0		Req.	<= 500 30 Day Average	<= 750 7 Day Average	Pounds per Day		<= 30 30 Day Average	<= 45 7 Day Average	Milligrams per Liter		Weekly	C(
NODI:		NODI										
50050	Flow, in conduit or thru treatment plant	Smpl.				= 1.04	= 1.14	= 1.4	MGD		99/99	T
1 - Effluent Gross												
Season: 0		Req.				Req Mon 30 Day Average	Req Mon 7 Day Average	Req Mon Daily Maximum	Million Gallons per Day		Continuous	T(
NODI:		NODI										

		Value 1	Value 2	Units	Value 1	Value 2	Value 3	Units	# of Ex.	Freq. of Analysis
50060	Chlorine, total residual	Smpl.					= 0	ug/L		01/01
A - Disinfection, Process Complete		Req.					<= 11 Instantaneous Maximum	Micrograms per Liter		Daily
Season: 0		NODI								
NODI:										
51040	E. coli	Smpl.				= 30.61	= 78.66	CFU/100mL		03/07
1 - Effluent Gross		Req.				<= 206 30 Day Average Geometric	<= 940 Daily Maximum	Colony Forming Units per 100ml		Three Per Week
Season: 0		NODI								
NODI:										
81010	BOD, 5-day, percent removal	Smpl.			= 89.59			%		01/07
1 - Effluent Gross		Req.			>= 85 Monthly Average Minimum			Percent		Weekly
Season: 0		NODI								
NODI:										
81011	Solids, suspended percent removal	Smpl.			= 96.15			%		01/07
1 - Effluent Gross		Req.			>= 85 Monthly Average Minimum			Percent		Weekly
Season: 0		NODI								
NODI:										

Edit Check Errors

No results.

DMR Comments

Comments

W SYSTEM IS USED FOR DISINFECTION,CHANGED LOW PH VALUE FROM 7.55 TO 7.53 FOR WRONG VALUE WAS REPORTED

Attachments

File Name	Type	Size	Remove
ewer overflow december 2016.pdf	Portable document format: Adobe Acrobat File	< 1 MB	✖

Report Last Saved By

er:	Manny
me:	Manuel Orosco
Mail:	silvercitywwtp@powerc.net
te/Time:	02/22/17 3:44 CST

View All CORs | Download All CORs in XML | Download All CORs in PDF | Download COR Signature Public Key | DMR/COR Search Results

Submission Confirmation - a8f8e285-22ce-4f95-a177-155d6aec515a

Your submission has been received.

Permit ID	Facility	Permitted Feature	Discharge #	Discharge Description	Monitoring Period End Date	DMR Due Date	View COR	Download COR in XML	Download COR in PDF	Download COR Signature
NM0020109	SILVER CITY, TOWN OF WWTP	001	001-A	TREATED MUNICIPAL WASTEWATER	12/31/16	01/15/17				